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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ANNIVERSARY MINING CLAIMS, LLC, a  
Nevada Limited Liability Company,

Plaintiff,

vs.

THE FIVE STAR TRUST DATED  
05/27/2015, a Nevada trust; P8 EQUIPMENT,  
LLC, a Nevada limited liability company;  
KIEWIT INFRASTRUCTURE WEST CO., a  
California corporation; CHICAGO TITLE CO,  
a California corporation; CALIFORNIA  
DEPARTMENT OF TRANSPORTATION, a  
California state agency; ERIC  
CHRISTENSEN, an individual;

Defendants.

CASE NO.:  
2:19-cv-1781-JAD-VCF

**STIPULATION AND ORDER  
TO EXTEND TIME TO FILE  
RESPONSE TO  
DEFENDANT KIEWIT  
INFRASTRUCTURE WEST  
CO.'S MOTION FOR  
JUDGMENT ON THE  
PLEADINGS AND REQUEST  
FOR ATTORNEY'S FEES**

ECF No. 52

IT IS HEREBY stipulated by and between Plaintiff, by and through its attorney of record, Mitchell S. Bisson, Esq. of the Law Offices of Mitchell S. Bisson, and Defendant KIEWIT INFRASTRUCTURE WEST CO., by and through its attorney of record, Michael E. Kostrinsky, Esq. of Lee, Landrum, Marking & Ingle, APC, to the following:

1. On or about March 3, 2021, Defendant KIEWIT INFRASTRUCTURE WEST CO. filed its Motion for Judgment on the Pleadings Pursuant to FRCP 12(c) and Request for Attorneys' Fees Pursuant to 28 USC §1927 (Document 51) ("Motion").
2. Prior to this instant Stipulation and Order to Extend Time to File Response to Defendant's Motion, the initial deadline for Plaintiff to respond was March 17, 2021.

3. Plaintiff's counsel has represented that the pandemic and workload has presented administrative burdens regarding the filing of Plaintiff's Response to Defendants' Motion herein mentioned.

4. Based on this representation, the parties agree that providing another week for Plaintiff to respond to Defendant's Motion, and concurrently providing Defendant its statutory seven days to file a Reply, is agreeable.

5. Accordingly, the parties herein stipulate to extend the time to file Plaintiff's Response to Defendant's Motion for Judgment on the Pleadings Pursuant to FRCP 12(c) and Request for Attorneys' Fees Pursuant to 28 USC §1927 (Document 51), from March 17, 2021 to **March 24, 2021**.

6. The parties further stipulate to provide Defendant KIEWIT INFRASTRUCTURE WEST CO. seven (7) days to file a Reply to Plaintiff's Response after Plaintiff's Response herein mentioned is served.

This extension is made in good faith and not for the purpose of delay.

IT IS SO STIPULATED this 17<sup>th</sup> day of March 2021.


LAW OFFICES OF  
MITCHELL S. BISSON

/s/ Mitchell S. Bisson  
Mitchell S. Bisson, Esq.  
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LEE, LANDRUM, MARKING  
& INGLE, APC

/s/ Michael E. Kostrinsky  
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7575 Vegas Drive, Suite 150  
Las Vegas, NV 89128  
*Attorney for Defendant*  
**KIEWIT INFRASTRUCTURE  
WEST CO.**

**IT IS SO ORDERED.**

  
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U.S. District Judge Jennifer A. Dorsey  
Dated: March 23, 2021